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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 PHILIPPE LAURENT,

14 Plaintiff,

15 vs.

16 ARTHUR V. BUSH, et, al.,

17 Defendants.

18 CITIBANK, N.A., AS TRUSTEE FOR THE
19 REGISTERED HOLDERS OF THE
20 PHHMC MORTGAGE PASS-THROUGH
21 CERTIFICATE SERIES 2007-6; PHH
22 MORTGAGE CORPORATIONS; MORTGAGE
23 ELECTRONIC REGISTRATION SYSTEMS,
24 INC.,

25 Counterclaimant,

26 vs.

27 PHILIPPE LAURENT,

28 Counterdefendant.

CASE NO. 2:15-cv-02495-RFB-GWF

STIPULATION AND ORDER TO
EXTEND TIME FOR
PHILIPPE LAURENT TO FILE
A MOTION FOR SUMMARY
JUDGMENT PURSUANT TO
STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE

(First Request)

22 Pursuant to LR 1A 6-1 and 7-1, Citibank, N.A., as Trustee for the Registered Holders
23 of the PHHMC Mortgage Pass-Through Certificate Series 2007-6, PHH Mortgage
24 Corporation and Mortgage Electronic Registration Systems, Inc. (collectively "Citibank"), and
25 Philippe Laurent ("Laurent") stipulate and agree as follows:

26 On December 19, 2018, Citibank and Laurent filed a Stipulation and Order to Extend
27 Dispositive Motion Deadline ("Stipulation") [ECF 67]. On January 7, 2019, the Court granted
28 the Stipulation and extended the dispositive motion deadline to January 18, 2019. [ECF 68]. On

1 January 18, 2019., Citibank filed its Motion for Summary Judgment [ECF 69]. Because of a
2 family matter, Laurent's counsel had to travel out-of-town on January 17, 2019 and returned
3 back into Las Vegas on January 21, 2019. Thus, in order to afford Laurent the opportunity to
4 file his Motion for Summary Judgment, an extension of up to and including January 29, 2019 is
5 necessary.

6 This stipulation is the first request regarding Laurent's Motion for Summary Judgment.
7 This extension is requested in good faith and is not for purposes of delay or prejudice to any
8 other party.

9 WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED
10 that the deadline for Laurent to file his Motion for Summary Judgment will be extended from
11 January 18, 2019 to January 29, 2019.

12 DATED this 22nd day of January, 2019.

DATED this 22nd day of January, 2019.

13 /s/ Holly Ann Priest
14 Holly Ann Priest, Esq.

Ballard Spahr LLP

Nevada Bar No. 13226

15 1980 Festival Plaza Dr., Suite 900

16 Las Vegas, Nevada 89135

Attorney for Citibank, N.A., as Trustee for the

17 Registered Holders of the PHHMC Mortgage Pass-Through

18 Certificate Series 2007-6, PHH Mortgage Corporation and Electronic Registration
19 Systems, Inc.

/s/ Joseph Y. Hong

Joseph Y. Hong, Esq.

Nevada Bar No. 5995

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Las Vegas, Nevada 89135

Attorney for Philippe Laurent

20 **ORDER**

21 **IT IS SO ORDERED.**

22 DATED this 29th day of January, 2019.

23 
24 RICHARD F. BOULWARE, II
25 United States District Judge

26 Respectfully submitted By:

27 
28 Joseph Y. Hong, Esq.

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Attorney for Philippe Laurent